

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Case No. 1:24-cv-7362

Plaintiff,

-against-

ZHABILOV ET AL,

Defendants.

DECLARATION

I, Robert G. Heim, declare under penalty of perjury, that the following is true and correct:

1. I am a member in good standing of the Bar of the State of New York and am a member of the law firm of Tarter Krinsky & Drogin LLP which is currently counsel of record for Defendant Dannie Zhabilov.

2. I was admitted to this Court on April 9, 1996.

3. I submit this declaration in support of the Stipulation and Order Substituting Attorneys to substitute the law firm of Lucosky Brookman LLP, by and through its attorneys, Samuel L. Blatnick and Anne Melton, as attorneys of record for Defendant Dannie Zhabilov in this action in place and instead of Defendant's current counsel.

4. This substitution should cause no delay in the proceedings of this case.

5. Defendant Dannie Zhabilov has consented to the substitution of attorneys, as evidenced in the Consent to Change Attorney form accompanying this Declaration.

6. Tarter Krinsky & Drogin LLP and Lucosky Brookman LLP have both executed the Stipulation and Order Substituting Attorney accompanying this Declaration.

WHEREFORE, it is respectfully requested that the Stipulation and Order Substituting Attorneys be granted.

Dated: December 16, 2024.

/s/ Robert G. Heim
Robert G. Heim